

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES,	)	No. 12 CR 109
	)	
	)	Judge Sharon Johnson Coleman
vs.	)	
	)	
Heon Seok Lee		

**Motion to Modify Conditions of Release and Designate a  
New Third Party Custodian**

Heon Seok Lee, defendant, by and through his attorney, Susan Shatz, respectfully moves this Honorable Court to Modify his Conditions of Release and to designate a new third party custodian. Mr. Lee submits the following in support of his Motion.

1. Mr. Lee's aunt and uncle (the Hwangs) have been his third party custodians for the last 10 months. During this time they have been unable to participate in many of their normal activities. Mrs. Hwang has bourn the brunt of the third party custodian responsibilities since Mr. Hwang returned to work, full time, last October. Shortly before Mr. Lee began to reside with the Hwangs, Mrs. Hwang completed treatment for a serious illness. She feels worn out and needs additional time to devote to her recovery.

2. Mr. Lee's mother, Kwnag Ja Kim came to the U.S. last November to assist the Hwangs. She rented an apartment near the Hwangs home and has tried to pitch in.

3. Due to the stress Mrs. Hwang is feeling, it is respectfully requested that the Court relieve the Hwangs of their third party custodian responsibilities and allow Mrs. Kim to become Mr. Lee's third part custodian.

4. Mrs. Kim understands and agrees that she will remain in the U.S. through the completion of the trial.

5. Undersigned counsel discussed this matter with pretrial services officer Justin Wiersema. Mr. Wiersema met with Mrs. Kim during a recent visit to the Hwangs residence. He agrees that Mrs. Kim would be an appropriate third party custodian with the conditions that she:

1. Surrender her passport to pretrial services
2. Produce the lease on her apartment for verification
3. Agree to report to him immediately, if Mr. Lee violates any conditions of his release
4. Agrees to remain in the U.S. through the completion of the trial; and
5. That Mr. Lee remain on home monitoring.

6. Mr. Wiersema further stated that Mr. Lee has remained in compliance with all the conditions of his bond to date and noted that a substantial bond was posted.

Wherefore, it is respectfully requested that this Honorable Court modify the conditions of Mr. Lee's release and permit his mother to become his third party custodian.

Susan Shatz  
53 W. Jackson Blvd. # 1615  
Chicago, IL. 60604  
312-697-0022

Respectfully submitted,  
  
S/Susan Shatz  
Susan Shatz  
Attorney for Heon Seok Lee

### CERTIFICATE OF SERVICE

I, Susan Shatz, an attorney, certify that I caused a copy of the above **Heon Seok Lee's Motion to Modify the Conditions of Release**, to be served by electronic filing on February 19, 2016;

on:

AUSA Patrick Otlewski  
U.S. Attorney's Office  
219 S. Dearborn St., 5th Floor  
Chicago, IL 60604

Executed on, February 19, 2016

S/ Susan Shatz